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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**META AND STATE AGS' NOTICE OF  
FILING OF (1) SUBSTANTIAL  
COMPLETION AND (2) DEPOSITION-  
RELATED DEADLINES APPLICABLE TO  
PLAINTIFFS AND/OR STATE AGENCIES  
IN STATE AG CASES**

Pursuant to the Court's instruction in the January 24, 2025, Case Management Order, ECF No. 1608, Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, "Meta") and the State Attorneys General ("State AGs") provide the Court with the following lists of substantial completion and deposition-related deadlines applicable to Plaintiffs and the state agencies in the State AG cases:

I. Substantial Completion Deadlines

II. Deadlines for Meta to Serve Notices of Fact Depositions<sup>1</sup>

III. Deadlines to Meet and Confer re: Scheduling of Rule 30(b)(6) and Fact Depositions

IV. Deadlines to File Discovery Letter Briefs re: Disputes Concerning Scheduling or Taking of Rule 30(b)(6) and Fact Depositions

V. Deadlines to Complete Rule 30(b)(6) and Fact Depositions

**I. Substantial Completion Deadlines (January 10-February 21)<sup>2</sup>**

- January 10 – All other State AGs and state agencies (not otherwise specifically identified on this list)
- January 14 – Nebraska (Governor)
- January 17 – Connecticut, Missouri

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<sup>1</sup> Meta timely served Rule 30(b)(6) notices to each of the States on December 13, 2024, and amended notices on January 21, 2025.

<sup>2</sup> State agencies in Idaho, Maryland, Maine, Ohio, Washington, and West Virginia are not subject to the substantial completion deadlines discussed in this notice because those State AGs have not pled state consumer protection claims or are in discussions with Meta to dismiss those claims. As of February 10, 2025, at least one agency in the following States did not meet their respective substantial completion deadlines: Arizona, California, Colorado, Hawaii, Illinois, Kansas, Louisiana, Nebraska, New Jersey, New York, Pennsylvania, South Carolina, Wisconsin, and Virginia. New Jersey and certain California agencies have filed motions seeking to enlarge their time to substantially complete document productions. As reported in the Discovery Management Conference Statement, ECF No. 1665, Meta and the State AGs are meeting and conferring about whether they can reach agreement on a global extension of all states' agencies' substantial completion deadlines, accompanied by an extension of Meta's deadline, in turn, to complete depositions. The Parties expect to present any agreement on these extensions they are able to reach via a stipulation and proposed order to be submitted before the Case Management Conference.

- January 22 – North Carolina (Governor and DPI)
- January 24 – Louisiana, North Carolina (DHHS)
- January 31 – Arizona, Illinois, Indiana, Kansas, Michigan, Minnesota, New York, Ohio, Washington, Wisconsin, Oregon (agreement by Parties), South Carolina (agreement by Parties), Virginia (agreement by Parties)
- February 3 – California (CalHHS, DHCS, and MHSOAC),<sup>3</sup> Colorado, Delaware, South Dakota (all agencies except DSS)
- February 7 – California (including the California executive agencies), Hawaii, Maine, Nebraska (all other agencies, besides Governor), New Jersey, Pennsylvania, Rhode Island
- February 10 – South Dakota (DSS)
- February 21 – Kentucky

## **II. Deadlines for Meta to Serve Notices of Fact Depositions (February 14-March 5)**

- February 14 – North Carolina
- February 21 – All other State AGs and state agencies (not otherwise specifically identified on this list)
- March 5 – Rhode Island

## **III. Deadlines to Meet and Confer re: Scheduling of Rule 30(b)(6) and Fact Depositions (January 6-February 14)**

### **A. 30(b)(6) Depositions**

- Deadlines began to pass on January 6, and have passed for all State AGs and state agencies.

### **B. Fact Depositions**

- February 14 – All State AGs and state agencies

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<sup>3</sup> The Mental Health Services Oversight and Accountability Commission (“MHSOAC”) is now known as the Behavioral Health Services Oversight and Accountability Commission (“BHSOAC”).

**IV. Deadlines to File Discovery Letter Briefs re: Disputes Concerning Scheduling or Taking of Rule 30(b)(6) and Fact Depositions (January 13-March 14)**

**A. 30(b)(6) Depositions**

- Deadlines began to pass on January 13, and have passed for all State AGs and state agencies.<sup>4</sup>

**B. Fact Depositions**

- February 21 – All State AGs and state agencies other than the below.
- March 14 – North Carolina

**V. Deadlines to Complete Rule 30(b)(6) and Fact Depositions (March 7-April 4)**

**A. Completion of 30(b)(6) Depositions**

- March 7 – All other State AGs and agencies other than the below.
- March 14 – Indiana
- March 17 – Washington
- March 28 – Kentucky
- April 4 – Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Illinois, Kansas, Michigan, Minnesota, Nebraska, Rhode Island

**B. Completion of Fact Depositions**

- April 4 – All State AGs and state agencies

DATED: February 10, 2025

Respectfully submitted,

**COVINGTON & BURLING LLP**

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<sup>4</sup> Meta and the State AGs continue to meet and confer regarding Meta's amended 30(b)(6) notices and intend to file a joint letter brief on February 10, 2025 regarding certain disputes related to those notices.

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**ATTESTATION**

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: February 10, 2025

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen